

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CHUN-KO CHANG, YI RAN WANG, GUANEE
XIE, and HOFMANN ZHU, individually and on
behalf of all other similarly situated,

Plaintiffs,

v.

SHEN YUN PERFORMING ARTS, INC., FEI
TIAN COLLEGE, FEI TIAN ACADEMY OF
THE ARTS, DRAGON SPRINGS BUDDHIST
INC., INTERNATIONAL BANK OF CHICAGO,
SHUJIA GONG a/k/a TIANLIANG ZHANG,
HONGZHI LI, and RUI LI a/k/a SANDY
REBECCA LEE,

Defendants.

Case No.: 24-cv-8980

Hon. Phillip M. Halpern

**NOTICE OF DEFENDANT INTERNATIONAL BANK OF CHICAGO'S MOTION TO
DISMISS THE SECOND AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendant International Bank of Chicago's ("IBC") Motion to Dismiss the Second Amended Complaint, and such other and further papers and proceedings as may be filed or had, IBC will move this Court before the Honorable Philip M. Halpern, United States District Judge, in the United States District Court for the Southern District of New York, at the United States Courthouse, 300 Quarropas Street, White Plains, New York 10601, on a date and time to be determined by the Court, for an Order, granting IBC's Motion to Dismiss and dismissing the Second Amended Complaint, as against IBC, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure.

Dated: July 30, 2025

/s/ Felicia S. Ennis

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